



October 24, 2011

Via UPS Overnight

Keith Olinger, SFD-7-5
United States Environmental Protection Agency, Region IX
Superfund Division
75 Hawthorne Street
San Francisco, CA 94105

**Re: Omega Chemical Corporation Superfund Site
U.S. EPA Request for Information**

Dear Mr. Olinger:

Please accept this letter and its attachments as the response of Exxon Mobil Corporation (hereafter "ExxonMobil") to the Section 104(e) information request (the "Request") that EPA sent in connection with the Omega Chemical Superfund Site ("Omega" or the "Site"). That Request was received by ExxonMobil in July 2011. Thank you for extending the deadline for the response.

GENERAL OBJECTIONS

This Request is overly broad and unduly burdensome and seeks information that is irrelevant and not calculated to lead to information that can legally be obtained under Section 104(e) of the CERCLA and therefore exceeds EPA's statutory authority under CERCLA. Section 104(e) of CERCLA grants "[a]ny officer, employee, or representative of the President, duly designated by the President..." the right to seek information under Section 104 (e)(2) through (4) of CERCLA. EPA has been designated by the President. Section 104 (e)(2) allows EPA to seek the following information:

- (A) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility.
- (B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.
- (C) Information relating to the ability of a person to pay for or to perform a cleanup.

EPA may also enter "[a]ny vessel, facility or establishment, or other place or property..." and take samples. 42 U.S.C. § 9604(e)(3). Similarly, EPA may inspect such locations and take samples. However, Section 104(e)(1) indicates that EPA's authority under 104(e) "may be exercised only for the purposes of determining the need for response, or choosing or taking any

response action under this subchapter, or otherwise enforcing the provisions of this subchapter." 42 U.S.C. § 9604(e)(1).

Thus, while EPA may require the submission of relevant information for the appropriate purposes, its authority is not unlimited. Even EPA's enforcement rights are limited. EPA may ask the Attorney General to commence a civil action to compel compliance with a 104(e) request, but, by statute, the court can only direct compliance with a 104(e) request if "there is a reasonable basis to believe there may be a release or threat of a release of a hazardous substance." 42 U.S.C. § 9604(e)(5)(B). Even then, it cannot do so if "under the circumstances of the case the demand for information or documents is arbitrary and capricious, an abuse of discretion, or otherwise not in accordance with law." 42 U.S.C. § 9604(e).

ExxonMobil, as set forth in the following pages and the attachment hereto, is providing to EPA the information readily available to ExxonMobil. Moreover, ExxonMobil is willing to provide any additional specific information requested by EPA in compliance with CERCLA to the extent that it is relevant and reasonably available. However, both ExxonMobil's response and any future information it may provide are subject to the following objections (hereafter the "General Objections"):

1. ExxonMobil objects to the Request to the extent that it seeks information beyond what is authorized by Section 104(e).
2. ExxonMobil asserts all applicable privileges and protections it has with regard to EPA's enumerated inquiries including the attorney-client privilege, the attorney work product doctrine, and materials generated in anticipation of litigation, and has attempted to exclude such materials from this response. As a result of providing any of the documents or information included in its response to EPA's request, ExxonMobil does not waive any privilege, including attorney work product protection, that may apply to any documents or information concerning the same subject matter which are privileged, confidential or subject to attorney work product protection. In addition, ExxonMobil asserts all applicable privileges for materials which are proprietary, company confidential, or trade secret.
3. The Request is overly broad and unduly burdensome in that it seeks information or documents regarding facilities prior to and after ExxonMobil's ownership or occupancy of the facilities. As such, each of these requests exceeds EPA's statutory authority under CERCLA and contravenes ExxonMobil's rights.
4. ExxonMobil objects to any requirement to produce documents or information already in the possession of a government agency, already in the public domain, or previously provided to EPA. Such requirement is duplicative and, therefore, unnecessary and burdensome.
5. ExxonMobil disavows any obligation to supplement these responses on an ongoing basis. CERCLA Section 104(e)(2) authorizes EPA to require submission of information upon reasonable notice. ExxonMobil, either directly or through the CSC, had already provided all relevant and readily available information to EPA. Notwithstanding the foregoing, if more information is desired, ExxonMobil is willing to provide additional information if specifically requested by EPA in the future and in compliance with CERCLA provided that the information

is relevant, reasonably available, has not already been provided, and is not otherwise subject to these objections.

Notwithstanding and without waiving these objections, and subject to them, ExxonMobil has prepared this response based upon the information available to it. Where questions or definitions are vague, ambiguous, overly broad, unduly burdensome, or beyond the scope of EPA's authority pursuant to Section 104(e) of CERCLA, ExxonMobil is making appropriate and reasonable efforts to provide responsive information based on ExxonMobil's interpretation of the Request. To the extent that information submitted herein is not required by law or is otherwise outside the scope of EPA's 104(e) authority, that information is voluntarily submitted. ExxonMobil waives no rights or protection of information it voluntarily submits.

RESPONSES

Subject to the foregoing, ExxonMobil provides the following responses:

For All Respondents:

1. State the full legal name, address, telephone number, position(s) held by, tenure of, the individuals answering any of these questions on behalf of ExxonMobil Oil Company ...

Mark A. Zuschek
Exxon Mobil Corporation
3225 Gallows Road
Fairfax, VA 22037
Office: (703) 846-2793

Steven P. Anastos
ExxonMobil Environmental Services Company
3225 Gallows Road
Fairfax, VA 22037
Office: (703) 846-3393

2. State whether ExxonMobil Oil Company is a current or previous owner of the Property or any portion thereof...

ExxonMobil "Property" ownership dates back to August 16, 1922. At that date, General Petroleum Corporation, a predecessor of Mobil Oil Corporation purchased the property. The "Property" has subsequently been subdivided. According to the "Historical Chain of Title Reports", ExxonMobil's interest in the "Property" ceased in 2001. ExxonMobil as part of the sales agreement does maintain access to the "Property".

3. If at any time during ExxonMobil Oil Company's ownership it rented or leased the Property or any portion thereof ...

ExxonMobil has made appropriate and reasonable efforts to provide responsive information. No information relative to the question was identified.

4. Identify all individuals or entities who owned the Property or any portion thereof prior to ...

10623 FULTON WELLS AVENUE, FORMERLY 10607 NORWALK BOULEVARD, SANTA FE SPRINGS, CALIFORNIA

Title to the estate or interest covered by this report appears to be vested in:

SMW PROPERTIES, LLC, A CALIFORNIA LIMITED LIABILITY COMPANY

The following is the current property legal description:

All that certain piece or parcel of land being Parcel 1 of Parcel Map Number 26148, according to the map or plat thereof, as filed of record in Book 303, Pages 5 and 6, Los Angeles County, State of California

Assessor's Parcel Number(s): 8009-025-067, formerly a portion of Parcel 8009-025-008

1. HISTORICAL CHAIN OF TITLE

1. GRANT DEED

RECORDED: 08/16/1922

GRANTOR: John Russell Agee and Winifred H. Agee, his wife

GRANTEE: General Petroleum Corporation, a California corporation

INSTRUMENT: Book 1378, Page 75

2. CORPORATION GRANT DEED

RECORDED: 03/23/1988

GRANTOR: Mobil Oil Corporation successor to General Petroleum Corporation, a California corporation

GRANTEE: Mobil Foundation Inc., a New York not-for-profit corporation

INSTRUMENT: 88-394234

3. GRANT DEED

RECORDED: 03/26/2001

GRANTOR: John B. Agee a.k.a. John Blackburn Agee and Sally Agee, husband and wife

GRANTEE: Mobil Foundation Inc., a New York not-for-profit corporation

INSTRUMENT: 01-0487257

4. CORPORATION QUIT CLAIM DEED

RECORDED: 03/26/2001

GRANTOR: Pyramid Oil Company, a California corporation

GRANTEE: Hathaway Company, a California corporation

INSTRUMENT: 01-0487259

5. CORPORATION QUIT CLAIM DEED

RECORDED: 03/26/2001

GRANTOR: Hathaway Company, a California corporation

GRANTEE: Mobil Foundation Inc., a New York not-for-profit corporation

INSTRUMENT: 01-0487258

Mr. Keith Olinger
EPA, Region 9
Oct 24, 2011

6. CORPORATION GRANT DEED

RECORDED: 03/26/2001

GRANTOR: Mobil Foundation Inc., a New York not-for-profit corporation

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-0487260

7. CORPORATION QUIT CLAIM DEED

RECORDED: 03/26/2001

GRANTOR: Hathaway Company, a California corporation successor to Pyramid Oil Company, a California corporation

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-0487262

8. CORPORATION QUIT CLAIM DEED

RECORDED: 03/26/2001

GRANTOR: Mobil Oil Corporation successor to General Petroleum Corporation, a California corporation

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-0487263

9. GRANT DEED

RECORDED: 03/26/2001

GRANTOR: John B. Agee a.k.a. John Blackburn Agee and Sally Agee, husband and wife

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-0487264

10. GRANT DEED

RECORDED: 03/26/2001

GRANTOR: SFS Norwalk LLC, a Delaware limited liability company

GRANTEE: Clark Holdings, LLC, a California limited liability company

INSTRUMENT: 01-0487267

11. QUIT CLAIM DEED

RECORDED: 07/30/2001

GRANTOR: Mobil Foundation Inc., a New York not-for-profit corporation

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-1350315

12. QUIT CLAIM DEED

RECORDED: 07/30/2001

GRANTOR: Mobil Foundation Inc., a New York not-for-profit corporation

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-1350316

13. GRANT DEED

RECORDED: 08/27/2001

GRANTOR: Clark Holdings, LLC, a California limited liability company

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-1590765

14. GRANT DEED

RECORDED: 10/03/2002

GRANTOR: SFS Norwalk LLC, a Delaware limited liability company

GRANTEE: Steven M. Watts and Jayne L. Watts, husband and wife as to 41% interest; William T. Macnider and Mary K. Macnider, husband and wife as to 18% interest and Virginia Macnider Miller, as Trustee of the Macnider Family Trust as to 41% interest

INSTRUMENT: 02-2327868

15. QUIT CLAIM DEED

RECORDED: 01/17/2003

GRANTOR: Steven M. Watts and Jayne L. Watts, husband and wife as to 41% interest; William T. Macnider and Mary K. Macnider, husband and wife as to 18% interest and Virginia Macnider Miller, as Trustee of the Macnider Family Trust as to 41% interest

GRANTEE: SMW Properties, LLC, a California limited liability company

INSTRUMENT: 03-0162464

10628 FULTON WELLS AVENUE, FORMERLY 10607 NORWALK BOULEVARD, SANTA FE SPRINGS, CALIFORNIA

Title to the estate or interest covered by this report appears to be vested in:

CLARK HOLDINGS, LLC, A CALIFORNIA LIMITED LIABILITY COMPANY

The following is the current property legal description:

All that certain piece or parcel of land being Parcel 1 of Parcel Map Number 26843, according to the map or plat thereof, as filed of record in Book 314, Pages 6 and 7, Los Angeles County, State of California

Assessor's Parcel Number(s): 8009-025-069, formerly a portion of Parcel 8009-025-008

1. HISTORICAL CHAIN OF TITLE

1. GRANT DEED

RECORDED: 08/16/1922

GRANTOR: John Russell Agee and Winifred H. Agee, his wife

GRANTEE: General Petroleum Corporation, a California corporation

INSTRUMENT: Book 1378, Page 75

2. CORPORATION GRANT DEED

RECORDED: 03/23/1988

GRANTOR: Mobil Oil Corporation successor to General Petroleum Corporation, a California corporation

GRANTEE: Mobil Foundation Inc., a New York not-for-profit corporation

INSTRUMENT: 88-394234

3. GRANT DEED

RECORDED: 03/26/2001

GRANTOR: John B. Agee a.k.a. John Blackburn Agee and Sally Agee, husband and wife

Mr. Keith Olinger
EPA, Region 9
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GRANTEE: Mobil Foundation Inc., a New York not-for-profit corporation
INSTRUMENT: 01-0487257

4. CORPORATION QUIT CLAIM DEED

RECORDED: 03/26/2001

GRANTOR: Pyramid Oil Company, a California corporation

GRANTEE: Hathaway Company, a California corporation

INSTRUMENT: 01-0487259

5. CORPORATION QUIT CLAIM DEED

RECORDED: 03/26/2001

GRANTOR: Hathaway Company, a California corporation

GRANTEE: Mobil Foundation Inc., a New York not-for-profit corporation

INSTRUMENT: 01-0487258

6. CORPORATION GRANT DEED

RECORDED: 03/26/2001

GRANTOR: Mobil Foundation Inc., a New York not-for-profit corporation

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-0487260

7. CORPORATION QUIT CLAIM DEED

RECORDED: 03/26/2001

GRANTOR: Hathaway Company, a California corporation successor to Pyramid Oil Company, a California corporation

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-0487262

8. CORPORATION QUIT CLAIM DEED

RECORDED: 03/26/2001

GRANTOR: Mobil Oil Corporation successor to General Petroleum Corporation, a California corporation

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-0487263

9. GRANT DEED

RECORDED: 03/26/2001

GRANTOR: John B. Agee a.k.a. John Blackburn Agee and Sally Agee, husband and wife

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-0487264

10. GRANT DEED

RECORDED: 03/26/2001

GRANTOR: SFS Norwalk LLC, a Delaware limited liability company

GRANTEE: Clark Holdings, LLC, a California limited liability company

INSTRUMENT: 01-0487267

11. QUIT CLAIM DEED

RECORDED: 07/30/2001

GRANTOR: Mobil Foundation Inc., a New York not-for-profit corporation

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GRANTEE: SFS Norwalk LLC, a Delaware limited liability company
INSTRUMENT: 01-1350315
COMMENTS: This deed was recorded out of order to clear title.

12. QUIT CLAIM DEED

RECORDED: 07/30/2001

GRANTOR: Mobil Foundation Inc., a New York not-for-profit corporation

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-1350316

COMMENTS: This deed was recorded out of order to clear title.

10629 NORWALK BOULEVARD, FORMERLY 10607 NORWALK BOULEVARD, SANTA FE SPRINGS, CALIFORNIA

Title to the estate or interest covered by this report appears to be vested in:

MICHELLE F. SMITH, TRUSTEE OF THE MICHELLE F. SMITH UDT DATED JULY 24, 2007
AND SUZANNE J. CRAWFORD, TRUSTEE OF THE SUZANNE J. CRAWFORD TRUST
DATED OCTOBER 6, 2000 AND WHOLLY AMENDED AND RESTATED ON JULY 29, 2010

The following is the current property legal description:

All that certain piece or parcel of land being Parcel 2 of Parcel Map Number 26843, according to the map or plat thereof, as filed of record in Book 314, Pages 6 and 7, Los Angeles County, State of California

Assessor's Parcel Number(s): 8009-025-070, formerly a portion of Parcel 8009-025-008

1. HISTORICAL CHAIN OF TITLE

1. GRANT DEED

RECORDED: 08/16/1922

GRANTOR: John Russell Agee and Winifred H. Agee, his wife

GRANTEE: General Petroleum Corporation, a California corporation

INSTRUMENT: Book 1378, Page 75

2. CORPORATION GRANT DEED

RECORDED: 03/23/1988

GRANTOR: Mobil Oil Corporation successor to General Petroleum Corporation, a California corporation

GRANTEE: Mobil Foundation Inc., a New York not-for-profit corporation

INSTRUMENT: 88-394234

3. GRANT DEED

RECORDED: 03/26/2001

GRANTOR: John B. Agee a.k.a. John Blackburn Agee and Sally Agee, husband and wife

GRANTEE: Mobil Foundation Inc., a New York not-for-profit corporation

INSTRUMENT: 01-0487257

4. CORPORATION QUIT CLAIM DEED

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EPA, Region 9
Oct 24, 2011

RECORDED: 03/26/2001

GRANTOR: Hathaway Company, a California corporation

GRANTEE: Mobil Foundation Inc., a New York not-for-profit corporation

INSTRUMENT: 01-0487258

5. CORPORATION QUIT CLAIM DEED

RECORDED: 03/26/2001

GRANTOR: Pyramid Oil Company, a California corporation

GRANTEE: Hathaway Company, a California corporation

INSTRUMENT: 01-0487259

6. CORPORATION GRANT DEED

RECORDED: 03/26/2001

GRANTOR: Mobil Foundation Inc., a New York not-for-profit corporation

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-0487260

7. CORPORATION QUIT CLAIM DEED

RECORDED: 03/26/2001

GRANTOR: Hathaway Company, a California corporation successor to Pyramid Oil Company, a California corporation

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-0487262

8. CORPORATION QUIT CLAIM DEED

RECORDED: 03/26/2001

GRANTOR: Mobil Oil Corporation successor to General Petroleum Corporation, a California corporation

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-0487263

9. GRANT DEED

RECORDED: 03/26/2001

GRANTOR: John B. Agee a.k.a. John Blackburn Agee and Sally Agee, husband and wife

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-0487264

10. GRANT DEED

RECORDED: 03/26/2001

GRANTOR: SFS Norwalk LLC, a Delaware limited liability company

GRANTEE: Clark Holdings, LLC, a California limited liability company

INSTRUMENT: 01-0487267

11. QUIT CLAIM DEED

RECORDED: 07/30/2001

GRANTOR: Mobil Foundation Inc., a New York not-for-profit corporation

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-1350315

COMMENTS: This deed was recorded out of order to clear title.

12. QUIT CLAIM DEED

RECORDED: 07/30/2001

GRANTOR: Mobil Foundation Inc., a New York not-for-profit corporation

GRANTEE: SFS Norwalk LLC, a Delaware limited liability company

INSTRUMENT: 01-1350316

COMMENTS: This deed was recorded out of order to clear title.

13. GRANT DEED

RECORDED: 02/25/2003

GRANTOR: Clark Holdings, LLC, a California limited liability company

GRANTEE: Pristine Properties, a California general partnership

INSTRUMENT: 03-0537175

14. QUIT CLAIM DEED

RECORDED: 11/15/2007

GRANTOR: Pristine Properties, a California general partnership

GRANTEE: Michelle F. Smith, a single woman as to an undivided 50% interest and Suzanne J. Crawford, a single woman as to an undivided 50% interest

INSTRUMENT: 20072553623

15. TRUST TRANSFER DEED

RECORDED: 03/11/2008

GRANTOR: Michelle F. Smith, a single woman

GRANTEE: Michelle F. Smith, Trustee of the Michelle F. Smith UDT dated July 24, 2007

INSTRUMENT: 20080412613

16. TRUST TRANSFER DEED

RECORDED: 09/29/2010

GRANTOR: Suzanne J. Crawford, a single woman

GRANTEE: Suzanne J. Crawford, Trustee of the Suzanne J. Crawford dated October 6, 2000 and wholly amended and restated on July 29, 2010

INSTRUMENT: 2010138518

5. EPA information indicates that, on March 23, 1988, Mobil Oil Corp. transferred title of the Property to Mobil Foundation Inc. ...

See attached copy of Corporation Grant Deed of Gift effective March 15, 1988.

6. EPA information indicates that Mobil Foundation, Inc. merged out of existence on December 7, 2001. ...

See attached Certification of Merger dated December 12, 2001.

7. For the entire period that you owned and/or operated at the Property or any portion thereof, identify and explain ...

ExxonMobil objects to this question as overly broad, unduly burdensome, or beyond the scope of USEPA's authority pursuant to Section 104(e) of CERCLA. ExxonMobil has made appropriate and reasonable efforts to provide responsive information.

Aerial photographs dating to 1928 and historical topographic maps dating to 1902 were reviewed. Oil production operations are evident in and around Santa Fe Springs in the 1925 topographic map and in the 1928 aerial photograph. Oil operations continue to be evident in and around the Santa Fe Springs area through at least 1981.

For the subject "Property", aerial photos indicate the presence of oil production operations from 1928 with observable production operations largely removed in the 1968 aerial photograph. Historical topographic maps appear to corroborate evidence seen in the aerial photographs although timing of photos and maps is not identical.

8. Identify all operators at the Property before, during and after your ownership of the Property or any portion ...

ExxonMobil objects to this question as overly broad, unduly burdensome, or beyond the scope of USEPA's authority pursuant to Section 104(e) of CERCLA. ExxonMobil has made appropriate and reasonable efforts to provide responsive information.

Response #4 above provides a listing of all property transactions related to the subject "Property".

9. At the time of the transfer of the Property from Mobil Oil Corp., describe the environmental condition ...

See attached "Response to CRWQCB-LAR Directive Letter" (1155 R01.pdf on accompanying CD) prepared by ERI and dated July 30, 2010 which describes current and historical "Property" environmental conditions.

10. Provide a scaled map of the property, which includes the locations of significant buildings and features. ...

Letter report described in the response # 9 provides site maps. Historical aerial photos are also provided for review.

11. Have you ever used, manufactured, produced, or generated and hazardous substances, materials or waste in the operations ...

ExxonMobil objects to this question as overly broad, unduly burdensome, or beyond the scope of USEPA's authority pursuant to Section 104(e) of CERCLA. ExxonMobil has made appropriate and reasonable efforts to provide responsive information. No information relative to the question was identified.

To the best of our knowledge, under the ownership of ExxonMobil, the "Property" was used for oil production purposes. None of the additional requested items were located.

12. Provide copies of all hazardous material business plans and chemical inventory forms (originals and updates) submitted to city ...

ExxonMobil has made appropriate and reasonable efforts to provide responsive information. No information relative to the question was identified.

13. Provide copies of any and all documents evidencing your environmental practices at the Property, including, but not limited to, ...

ExxonMobil has made appropriate and reasonable efforts to provide responsive information. No information relative to the question was identified.

Data from the California Geotracker system including reports generated by consultants on behalf of ExxonMobil and response letters from local agencies are included on the CD that is part of this submittal.

14. Provide copies of all technical or analytical environmental information, including, but not limited to, ...

Reports generated by consultants on behalf of ExxonMobil, agency response letters and other environmental information are included on the CD that is part of this submittal.

15. Provide copies of all information and documentation related to approval of any remediation or cleanup activities conducted ...

Reports generated by consultants on behalf of ExxonMobil, agency response letters and other environmental information are included on the CD that is part of this submittal.

16. At the time ExxonMobil Oil Corporation first took possession of the Property, and for each subsequent transfer that resulted ...

Ownership of the "Property" by ExxonMobil dates back to 1922 as indicated in question #4. The environmental condition of the "Property" prior to ExxonMobil's ownership period is unknown. An aerial photograph dated 1928 indicates that properties to the south and west of the subject "Property" appear to be agricultural in nature. Properties east and north of the subject "Property" appear as oil producing and storage. The response to question #9 provides information related to known environmental impacts on the "Property".

17. Information obtained by EPA suggests that ExxonMobil Oil Corporation may have solicited the preparation of a draft subsurface soil investigation from Levine Fricke ...

ExxonMobil has provided the Levine Fricke data.

18. Provide a list of employees who had knowledge of the use and disposal of hazardous substances at the Property ...

ExxonMobil objects to this question as overly broad, unduly burdensome, or beyond the scope of USEPA's authority pursuant to Section 104(e) of CERCLA. ExxonMobil has made appropriate and reasonable efforts to provide responsive information. No information relative to the question was identified.

CLOSING STATEMENT

Notwithstanding the foregoing, if EPA has a specific relevant question about a particular issue relevant to the "Property" and has a reasonable need for such information in connection with the Site, we will conduct an additional and more targeted search provided that we are given

Mr. Keith Olinger
EPA, Region 9
Oct 24, 2011

adequate time to do so. Please address further correspondence to our counsel, Mark Zuschek whose address and telephone are included in response number 1.

Very truly yours,

A handwritten signature in blue ink, appearing to read "SP Anastos".

Steven P. Anastos, PG
Project Manager
ExxonMobil Environmental Services Company